DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
19701 Fairchild Irvine, CA 92612-2445 (949)608-2900 Fax:(949)608-4417	12/6/2021-12/17/2021*
	FEI NUMBER 3013189568

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Gerard M. Jensen, Vice President Operations

FIRM NAME	STREET ADDRESS
Gilead Sciences Inc.	1800 Wheeler St
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
La Verne, CA 91750-5801	Sterile Drug Manufacturer

This document lists observations made by the FDA representative(s) during the inspection of your facility. They are inspectional observations, and do not represent a final Agency determination regarding your compliance. If you have an objection regarding an observation, or have implemented, or plan to implement, corrective action in response to an observation, you may discuss the objection or action with the FDA representative(s) during the inspection or submit this information to FDA at the address above. If you have any questions, please contact FDA at the phone number and address above.

DURING AN INSPECTION OF YOUR FIRM WE OBSERVED:
PRODUCTION SYSTEM

OBSERVATION 1
Procedures designed to prevent microbiological contamination of drug products purporting to be sterile did not include adequate validation of the aseptic process.

Specifically,

A. Your procedure, *SOP-10892, Aseptic Gowning Qualification, Intervention Qualification, and Monitoring, La Verne, Effective Date 28 Oct 2021, Revision: 11.0* part 2, step 3 states (b) (4) (b) (4) (b) (4) ". During our walkthrough of the microbiology laboratory on 12/09/2021, we reviewed (b) (4) plates collected during the filling of Ambisome Lot # 030132. We observed 21 of the plates collected from personnel monitoring during the filling of Ambisome Lot # 030132 did not show any fingertip impressions to confirm plating of personnel who were in the Aseptic Processing area.

Justification showing that the plates inoculated during the filling of AmBisome Lot #030132 are an adequate representation of the environment in which AmBisome Lot #030132 was filled in was unable to be provided.

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	DATE ISSUED
	Uttaniti Limchumroon, Investigator James B Arnett, Investigator Dogbeda F Mackenzie, Investigator Jacob G Lutz, Investigator X Uttaniti Limchumroon Investigator Signed By: Uttaniti Limchumroon -S Date Signed: 12-17-2021 15:52:01	12/17/2021

Your firm was unable to provide justification for how personnel monitoring plates collected during the aseptic filling are an accurate representation of the ISO 5 (Grade A) environment in which the sterile injectable drug product was filled.

B. The most recent airflow visualization study, approved on 04/30/2021, does not adequately show controlled airflow through the entire cross-section of a cleanroom or a clean zone with a steady velocity and direction, as is required by the following documents:

1. SOP-11483, *Airflow Visualization Evaluation, La Verne*, Revision 3.0, effective 03/19/2021;

2. LV-RQ-A-2011-0001.04, *Master Protocol – Airflow Visualization Study for ISO 5 (Grade A) and ISO 7 (Grade B with laminar flow only) (*(b) (4)*) Classed Areas (Operational State) within the Aseptic Processing Area (APA) (Asset # 90000046), Building L10, La Verne*, the current master protocol (approved on 12/08/2021); and

3. LV-RQ-A-2011-0001.03, *Master Protocol – Airflow Visualization Study for ISO 5 (Grade A) and ISO 7 (Grade B with laminar flow only) (*(b) (4)*) Classed Areas (Operational State) within the Aseptic Processing Area (APA) (Asset # 90000046), Building L10, La Verne*, the master protocol version effective at the time of execution of the most recent airflow visualization study.

Additionally, procedures governing airflow visualization studies do not adequately document steps taken to edit raw footage into a final video that is then reviewed by Quality during the

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
19701 Fairchild Irvine, CA 92612-2445 (949)608-2900 Fax:(949)608-4417	12/6/2021-12/17/2021* FEI NUMBER 3013189568

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	
Gerard M. Jensen, Vice President Operations	
FIRM NAME Gilead Sciences Inc.	STREET ADDRESS 1800 Wheeler St
CITY, STATE, ZIP CODE, COUNTRY La Verne, CA 91750-5801	TYPE ESTABLISHMENT INSPECTED Sterile Drug Manufacturer

approval process. From review of the final video from the most recent airflow visualization study, the following was observed:

1. Intervention C-11, *Infeed Guide Rails: Down/Jam Vial and Removal*, was not included in the edited video that was reviewed by Quality; the intervention actually displayed was I-6, *Verification of the Fill Weight Scales*.

2. Intervention C-14, *Down/Jam Vial and Removal – (b) (4) conveyors*, is required to be performed at (b) (4) and (b) (per governing documentation; the edited video reviewed by Quality only displayed the intervention performed at (b) (4) .

Furthermore, not all interventions performed were adequately simulated—for example, Intervention I-6, *Verification of Fill Weight Scales*, did not include analogues of the calibrated weights used during routine production; adequate justification for why an analogue was not present was not provided.

Since this study's approval on 04/30/2021, there have been approximately (b) (4) lots of sterile injectable drug product AmBisome manufactured at this site using this filling line, all of which were released.

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
19701 Fairchild Irvine, CA 92612-2445 (949)608-2900 Fax:(949)608-4417	12/6/2021-12/17/2021*
	FEI NUMBER 3013189568

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Gerard M. Jensen, Vice President Operations

FIRM NAME	STREET ADDRESS
Gilead Sciences Inc.	1800 Wheeler St
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
La Verne, CA 91750-5801	Sterile Drug Manufacturer

QUALITY SYSTEM

OBSERVATION 2
The responsibilities and procedures applicable to the quality control unit are not in writing and fully followed.

Specifically,

A. SOP-10926, *Inspection of In-Process and Finished Product Vials*, Revision 66.0, Effective Date 15 Oct 2021, requires employees to rotate out (b) (4) after continuous inspection while using the (b) (4) inspection machine. While observing personnel performing the visual inspection of AmBisome Lot #030136, we observed on form #LVMPR-006 that technicians are not required to document their (b) (4) while performing visual inspection of vials.

B. Procedures governing corrective and preventative actions (CAPAs) do not adequately describe how CAPAs are to be implemented in a timely manner. Between 12/06/2019 and 12/06/2021, approximately 290 CAPAs have been initiated.

OBSERVATION 3
Employees engaged in the manufacture and processing of a drug product lack the training required to perform their assigned functions.

Specifically,

During the walkthrough of your microbiology laboratory on 12/09/2021, we asked your firm to provide a list of all personnel monitoring excursions. In review of the document provided, we noticed that your

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
19701 Fairchild Irvine, CA 92612-2445 (949)608-2900 Fax:(949)608-4417	12/6/2021-12/17/2021* FEI NUMBER 3013189568

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Gerard M. Jensen, Vice President Operations

FIRM NAME	STREET ADDRESS
Gilead Sciences Inc.	1800 Wheeler St
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
La Verne, CA 91750-5801	Sterile Drug Manufacturer

Environmental monitoring personnel are allowed to self-plate per your procedure *SOP 10590, Environmental Monitoring of Product and Media Fills in La Verne, Effective date 27 Aug 2021, Revision 15.0, Section I.* We requested your firm to provide documentation for employee self-qualification. Your firm was unable to provide training documents to prove that all environmental monitoring personnel are qualified to self-plate.

FACILITIES AND EQUIPMENT

OBSERVATION 4
Buildings used in the of a drug product are not maintained in a good state of repair.

Specifically,

During our walkthrough of the Building L-50 Warehouse on 12/6/2021, we observed a gap underneath the door between tin cats (b) (4) and (b) (4). This door leads to the outside area of the warehouse and a possible pest entry point to the warehouse where raw materials and finished products are stored.

Additionally, during the review of the Pest Control Service Provider (PCSP) Service Inspection Reports, we observed repeated observations for the same conditions made by the service provider. For example,

Service Inspection Repots Dated 12/02/2021 included the following observations:

- Zone (b) (4) Building (b) (4) – "...Gap at bottom of door in the bulk chemical dispensing room." Initially

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
19701 Fairchild Irvine, CA 92612-2445 (949)608-2900 Fax:(949)608-4417	12/6/2021-12/17/2021*
	FEI NUMBER 3013189568

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

Gerard M. Jensen, Vice President Operations

FIRM NAME	STREET ADDRESS
Gilead Sciences Inc.	1800 Wheeler St
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
La Verne, CA 91750-5801	Sterile Drug Manufacturer

reported on 6/4/2020

- Zone (b)(4) Building (b)(4) – "...Door has gaps on bottom..." Initially reported on 6/17/2021

Your firm did not act upon the recommendations and observations made by your approved service provider.

***DATES OF INSPECTION**

12/06/2021(Mon), 12/07/2021(Tue), 12/08/2021(Wed), 12/09/2021(Thu), 12/10/2021(Fri), 12/13/2021(Mon), 12/14/2021(Tue), 12/15/2021(Wed), 12/16/2021(Thu), 12/17/2021(Fri)

X James B Arnett
Investigator
Signed By: James B. Arnett -S
Date Signed: 12-17-2021 15:52:41

X Dogbeda F Mackenzie
Investigator
Signed By: Dogbeda F. Mackenzie -S
Date Signed: 12-17-2021 15:53:26

X Jacob G Lutz
Investigator
Signed By: 2002879082
Date Signed: 12-17-2021 15:54:07

SEE REVERSE OF THIS PAGE

EMPLOYEE(S) SIGNATURE

Uttaniti Limchumroon, Investigator
James B Arnett, Investigator
Dogbeda F Mackenzie, Investigator
Jacob G Lutz, Investigator

X Uttaniti Limchumroon
Investigator
Signed By: Uttaniti Limchumroon -S
Date Signed: 12-17-2021 15:52:01

DATE ISSUED
12/17/2021

The observations of objectionable conditions and practices listed on the front of this form are reported:

1. Pursuant to Section 704(b) of the Federal Food, Drug and Cosmetic Act, or
2. To assist firms inspected in complying with the Acts and regulations enforced by the Food and Drug Administration.

Section 704(b) of the Federal Food, Drug, and Cosmetic Act (21 USC 374(b)) provides:

"Upon completion of any such inspection of a factory, warehouse, consulting laboratory, or other establishment, and prior to leaving the premises, the officer or employee making the inspection shall give to the owner, operator, or agent in charge a report in writing setting forth any conditions or practices observed by him which, in his judgment, indicate that any food, drug, device, or cosmetic in such establishment (1) consists in whole or in part of any filthy, putrid, or decomposed substance, or (2) has been prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth, or whereby it may have been rendered injurious to health. A copy of such report shall be sent promptly to the Secretary."